

Shaffer, Caleb

From: Quidilla, Clarita@Waterboards [Clarita.Quidilla@waterboards.ca.gov]
Sent: Friday, April 25, 2014 11:19 AM
To: Brian G. Anderson (andersonbg@vmcmail.com)
Cc: Elizabeth Weaver (elizabeth.weaver@nortonrosefulbright.com); Cross, Douglas@Waterboards; Yang, Wen@Waterboards; Chou, Rebecca@Waterboards; Lee, Kwang@Waterboards; Heath, Arthur@Waterboards; Shaffer, Caleb; Steve Hoch (shoch@mpplaw.com)
Subject: Hewitt Pit Landfill_Extension of Deadline, CI 2180_2014-04-21
Attachments: Hewitt Pit Landfill_Extension of Deadline, CI 2180_2014-04-21.pdf

The California Regional Quality Control Board for the Los Angeles Region (Regional Board) provides copies of correspondence through e-mail. The attached is your copy of recent correspondence; only the addressee will receive a hard copy.

The letter is in Adobe Acrobat PDF format. You can obtain an Acrobat Reader free of charge at <http://www.adobe.com/products/acrobat/readstep2.html>.

Please contact the project manager, Douglas Cross at (213) 620-2246 if you have any questions.

Thank you,

Clarita S. Quidilla
Staff Services Analyst
CA Regional Water Quality Control Board
Los Angeles Region 4
Phone #: (213) 576-1368
Fax #: (213) 576-6640



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

April 21, 2014

Mr. Brian G. Anderson, Director Government and Environmental Affairs
Vulcan Materials Company
500 North Brand Boulevard, Suite 500
Glendale, CA 91203

**EXTENSION OF DEADLINE FOR SUBMITTING A TECHNICAL REPORT
REQUIRED UNDER CALIFORNIA WATER CODE SECTION 13267 – HEWITT PIT
LANDFILL, NORTH HOLLYWOOD, CALIFORNIA (FILE NOS. 58-191, CI-2180)**


Dear Mr. Anderson:

On January 31, 2014, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board), issued an order pursuant to Section 13267 of the California Water Code (CWC), requiring you to submit a technical report for the closed Hewitt Pit Landfill, North Hollywood, California, by April 30, 2014. In a letter dated April 16, 2014, to the Regional Board, Ms. Elizabeth Weaver of Fulbright & Jaworski, LLP, requested one month extension of the deadline on your behalf. The letter stated that the request was made because your recently retained consultant was to obtain a new round of groundwater samples from wells on and around the Hewitt Landfill, and that the requested extension of the deadline would allow new data to be incorporated into the technical report.

We have evaluated the information provided and believe that an extension of the deadline is warranted. The deadline for submitting the required technical report is hereby extended to May 30, 2014.

If you have any questions or need additional information, please contact Mr. Douglas Cross (Project Manager) at (213) 620-2246 or dcross@waterboards.ca.gov, or Dr. Wen Yang (Chief of Land Disposal Unit) at (213) 620-2253 or wyang@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

cc: Caleb Shaffer, US Environmental Protection Agency, Region IX, San Francisco
Brian Ferris, CalMat
Elizabeth Weaver, Fulbright & Jaworski, LLP
Steve Hoch, Morris, Polich & Purdy, LLP

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

Shaffer, Caleb

From: Dabbaghian, Vahe [Vahe.Dabbaghian@WATER.LADWP.com]
Sent: Monday, March 17, 2014 8:42 AM
To: Watt, Jamey
Cc: Jonny, Hadi; Nova Clite; John.Lindquist@CH2M.com; Moore, Lawrence@Waterboards; Shaffer, Caleb; Liu, Paul
Subject: RE: request for further information regarding gw monitoring wells around Hewitt Pit

Hi Jamey,

In regards to your question below, the information in the two CD's that I hand delivered to you is not the same as the water quality data that I email you.

On March 11, 2014, I emailed you water quality data from LADWP production wells, including NHOU extraction wells. It did not include any monitoring wells data.

The two CD's that I gave you on March 7, 2014 summarizes analytical results from the groundwater sampling event conducted between October 2012 to June 2013, which include production and monitoring wells (FYI, this report was Task 4.1 of the Groundwater System Improvement Study).

I believe that I sent EPA all of the water quality data that we have.

Regards,

Vahe Dabbaghian, P.E.

Groundwater Remediation Group
Los Angeles Department of Water & Power
111 North Hope Street, Room 1217
Los Angeles, CA 90012
(213) 367-3543
vahe.dabbaghian@ladwp.com

From: Watt, Jamey [<mailto:Watt.Jamey@epa.gov>]
Sent: Friday, March 14, 2014 3:20 PM
To: John.Lindquist@CH2M.com; Nova Clite; Dabbaghian, Vahe; Jonny, Hadi
Cc: Moore, Lawrence@Waterboards; Shaffer, Caleb; Watt, Jamey
Subject: request for further information regarding gw monitoring wells around Hewitt Pit

Nova and John:

With some of the new data that is coming in from LADWP, can you please identify GW monitoring wells in the vicinity of Hewitt Pit and gw concentrations at these wells? Do we already have all of the data from HW's recent sampling events? AMEC's?

Is the "4.1 LADWP" data that Vahe provided on 2 CDs the same information as the Oct-Dec 2013 that he sent via email?

Hadi and Vahe:

Can you please let EPA know what additional data will be forthcoming from LADWP concerning the Hewitt Pit area issue?

Is the "4.1 LADWP" data that Vahe provided on 2 CDs the same information as the Oct-Dec 2013 that he sent via email?

Jamey Watt
Remedial Project Manager
415-972-3175

U.S. EPA, Region 9
Superfund Division, SFD-7-1
75 Hawthorne Street
San Francisco, CA 94105

-----Confidentiality Notice-----

This electronic message transmission contains information from the Los Angeles Department of Water and Power, which may be confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this communication in error, please notify us immediately by e-mail and delete the original message and any attachment without reading or saving in any manner.

Shaffer, Caleb

From: Watt, Jamey
Sent: Friday, March 14, 2014 3:20 PM
To: John.Lindquist@CH2M.com; Nova Clite; vahe.dabbaghian@ladwp.com; hadi.jonny@water.ladwp.com
Cc: Moore, Lawrence@Waterboards; Shaffer, Caleb; Watt, Jamey
Subject: request for further information regarding gw monitoring wells around Hewitt Pit

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Is the "4.1 LADWP" data that Vahe provided on 2 CDs the same information as the Oct-Dec 2013 that he sent via email?

Jamey Watt
Remedial Project Manager
415-972-3175

U.S. EPA, Region 9
Superfund Division, SFD-7-1
75 Hawthorne Street
San Francisco, CA 94105

Shaffer, Caleb

From: Yang, Wen@Waterboards [Wen.Yang@waterboards.ca.gov]
Sent: Wednesday, February 19, 2014 12:51 PM
To: Shaffer, Caleb
Cc: Cross, Douglas@Waterboards
Subject: RE: Hewitt Pit Landfill

Hi, Caleb,

This was in response to your email that was sent to me today. Doug is the case worker for the site. Please let us know if you have questions.

Wen Yang, Ph.D., C.E.G.

Chief, Land Disposal Unit
Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Phone: 213.620.2253
Facsimile: 213.576.5777
wyang@waterboards.ca.gov

From: Cross, Douglas@Waterboards
Sent: Wednesday, February 19, 2014 12:27 PM
To: Shaffer.Caleb@epa.gov
Cc: Yang, Wen@Waterboards
Subject: Hewitt Pit Landfill

Mr. Shaffer

Attached please find a copy of the 13267 Order that was submitted by our office.

Douglas Cross, PG, CHG, CEG
Engineering Geologist
Groundwater Permitting and Land Disposal Unit
Los Angeles Regional Water Quality Control Board (Region 4)
Phone: (213) 620-2246
Fax: (213) 576-5777

Shaffer, Caleb

From: Cross, Douglas@Waterboards [Douglas.Cross@waterboards.ca.gov]
Sent: Wednesday, February 19, 2014 12:27 PM
To: Shaffer, Caleb
Cc: Yang, Wen@Waterboards
Subject: Hewitt Pit Landfill
Attachments: Hewitt Pit Landfill_CA Water Code Section 13267, CI 2180_2014-01-31.pdf

Mr. Shaffer

Attached please find a copy of the 13267 Order that was submitted by our office.

Douglas Cross, PG, CHG, CEG
Engineering Geologist
Groundwater Permitting and Land Disposal Unit
Los Angeles Regional Water Quality Control Board (Region 4)
Phone: (213) 620-2246
Fax: (213) 576-5777



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

January 31, 2014

Mr. Brian G. Anderson
Director Government and Environmental Affairs
Vulcan Materials Company
500 North Brand Boulevard, Suite 500
Glendale, CA 91203

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Claim No. 7012 3460 0000 2166 2136

CALIFORNIA WATER CODE SECTION 13267 ORDER (NO. R4-2014-0007) TO SUBMIT INFORMATION – HEWITT PIT LANDFILL, NORTH HOLLYWOOD, CALIFORNIA (FILE NOS. 58-191; CI-2180)

Dear Mr. Anderson:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), is the public agency with primary responsibility for the protection of ground and surface water quality within major portions of Los Angeles and Ventura Counties, including the referenced site.

As part of our effort to protect water quality, pursuant to California Water Code (CWC) § 13267, the Regional Board is investigating surface and ground water impacts associated with the continued existence of the Hewitt Pit Landfill, North Hollywood, California.

The Regional Board requires the information as set forth in the attached Investigative Order No. R4-2014-0007 to evaluate potential threats to surface and ground water.

If you have any questions or need additional information, please contact Mr. Douglas Cross (Project Manager) at (213) 620-2246 or dcross@waterboards.ca.gov, or Dr. Wen Yang (Chief of Land Disposal Unit) at (213) 620-2253 or wyang@waterboards.ca.gov.

Sincerely,

Samuel Unger, P.E.
Executive Officer

Enclosures

cc: Caleb Shaffer, US Environmental Protection Agency, Region IX, San Francisco
Leslie Graves, Land Disposal Program, State Water Resource Control Board
Martin Perez, California Department of Resources Recycling and Recovery
David Thompson, City of Los Angeles Local Enforcement Agency

Los Angeles Regional Water Quality Control Board

**INVESTIGATIVE ORDER NO. R4-2014-0007 TO PROVIDE A TECHNICAL OR
MONITORING REPORT ON
RELEASE OF POLLUTANTS TO GROUNDWATER**

CALIFORNIA WATER CODE SECTION 13267

**DIRECTED TO CALMAT COMPANY
HEWITT PIT LANDFILL
7245-7361 LAUREL CANYON ROAD
NORTH HOLLYWOOD, CALIFORNIA
(FILE NOS. 58-191; CI-2180)**

The Regional Water Quality Control Board, Los Angeles Region (Regional Board) makes the following findings and issues this Order pursuant to California Water Code (CWC) section 13267.

1. On November 20, 2013, the US Environmental Protection Agency (USEPA) sent a letter to the Regional Board, expressing concerns that the Hewitt Pit Landfill (Landfill) located at 7245-7361 Laurel Canyon Road, North Hollywood, California, may potentially be releasing pollutants that are contributing to groundwater contamination in the area. The letter requests the assistance and cooperation of the Regional Board in the investigation of groundwater contamination in the vicinity of the Landfill.
2. The Landfill is a closed municipal solid waste (MSW) landfill that was operated between 1962 and 1975. It is approximately 58 acres in size and was originally a gravel mining pit owned by Consolidated Rock Products Company (ConRock). Landfill operations were conducted by the Los Angeles By-Products Company, which leased the property from ConRock. CalMat Company (CalMat) doing business as Vulcan Materials Company (Vulcan) merged with ConRock in approximately 1984 and is the current owner of the Landfill property.
3. The Landfill is within a flat lying urbanized alluvial plain where the approximate surface elevation ranges between 750 and 770 feet above mean sea level (amsl). The gravel mine was excavated to a depth of between 130 to 150 feet below ground surface. On December 18, 1958, the Regional Board adopted Resolution No. 58-91 prescribing waste discharge requirements (WDRs) for the operations of the Landfill. The Landfill is not equipped with a liner or leachate collection and removal system. Materials that were permitted to be deposited at the Landfill were limited to ordinary residential and commercial refuse, other decomposable organic refuse, scrap metals, and non-water soluble non-decomposable inert solids. Only solid inert wastes were permitted to be deposited at elevations below the 650 feet amsl contour line.
4. The Landfill was closed and capped with a soil cover in 1975. In 1977, a landfill gas collection and flare system was installed at the site. Over the years, the system has been replaced or rebuilt to control landfill gas migration. Because of land settling and soil being added to maintain the

cover, there is approximately 25 feet of soil cover over most of the Landfill. The site is currently leased to various tenants with mixed operations including self-storage, RV/boat storage, and auto auction. The closed Landfill is currently not regulated by WDRs adopted by the Regional Board.

5. As required under CWC Section 13273, CalMat submitted a solid waste assessment test (SWAT) proposal for the Landfill on April 1, 1987, completed the test in 1989, and submitted a SWAT report to the Regional Board on July 1, 1989, which was approved by Regional Board staff in a letter dated May 1, 1991. The SWAT report indicated that the Landfill was leaking waste constituents, although at levels lower than drinking water maximum contamination levels (MCLs), and might be affecting groundwater in the vicinity. In the Regional Board's SWAT approval letter, CalMat was directed to sample all groundwater monitoring wells at the site annually and submit monitoring data for various inorganic constituents to the Regional Board. On June 25, 1992, CalMat submitted the "1991 Annual Report" for groundwater monitoring at the Landfill to the Regional Board. The report concluded that landfill gas might have been affecting the local groundwater quality, although the constituent levels were below MCLs.
6. The Landfill lies within the North Hollywood Operable Unit (NHOU) of the USEPA San Fernando Valley Superfund Site (Area 1). On September 22, 1988, USEPA issued a joint letter with the Los Angeles Department of Water and Power (LADWP) to CalMat requesting information about the Landfill, including the operations, types of waste ever received and groundwater monitoring data. The Landfill was identified as a potentially responsible party for the NHOU.
7. On August 17, 1995, USEPA issued a letter to CalMat requesting access to the Landfill to conduct groundwater and soil vapor sampling. The letter stated that USEPA was conducting a Basin-wide Remedial Investigation/Feasibility Study (RI/FS) in the San Fernando Valley to determine both the sources and extent of groundwater contamination for groundwater remediation.
8. CalMat joined a Partial Consent Decree with USEPA in 1996 for the implementation of an interim remedy. The interim remedy consists of extracting and treating volatile organic compounds (VOCs) via the NHOU extraction and treatment system, and delivery of the treated groundwater to the City of Los Angeles's potable water supply.
9. On February 10, 2006, USEPA issued a combined request letter, jointly with the Regional Board, to CalMat requesting quarterly monitoring of the groundwater monitoring wells at the Landfill. CalMat submitted groundwater monitoring reports to USEPA in 2006 and 2007 that documented groundwater monitoring data collected from three groundwater monitoring wells at the Landfill. Data collected during this monitoring events indicated that trichloroethylene (TCE), tetrachloroethylene (PCE), 1,1-dichloroethane (1,1-DCE); manganese, and nitrate were present in groundwater at concentrations greater than their respective MCLs. In 2008, the US EPA entered into a Settlement Agreement for Recovery of Response Costs with CalMat and three other settling parties.
10. Groundwater monitoring data submitted to USEPA indicate that VOCs and 1,4 Dioxane have been detected in the groundwater monitoring wells near the Landfill. Groundwater produced from the LADWP's Rinaldi-Toluca well field, 500 to 1,000 feet east of the landfill, and the North Hollywood West well field, about 2,000 feet south of the landfill, has been impacted by VOCs and other emerging contaminants.

11. A technical memorandum submitted to USEPA by MWH Americas, Inc., (MWH, a consultant firm), dated November 29, 2012, concluded that the Landfill is a probable, significant cause of the VOCs contamination observed in downgradient wells. In addition, the technical memorandum indicated that the two downgrading monitoring wells (4909C and 4909F) at the eastern boundary of the Landfill were incorrectly located, because the groundwater flow at the site is predominantly southeast to southwest and that a better placement of the wells would have been along the southern boundary of the site. A Facility Summary Memorandum for the Landfill, dated January 2, 2013, also prepared by MWH, summarized groundwater conditions at the Landfill and identified potential data gaps.
12. On January 11, 2013, Vulcan submitted a letter requesting Regional Board staff's approval of the decommissioning and replacement of one existing groundwater monitoring well and the installation of two new groundwater monitoring wells as part of an assessment of groundwater quality at the Landfill. Regional Board staff informed Vulcan that a Report of Waste Discharge (ROWD), that includes updated information of the Landfill, should be submitted to the Regional Board in order for Regional Board staff to determine whether the proposed action should be approved. So far, such a ROWD has not been submitted to the Regional Board.
13. Based on the above findings, the Regional Board determines that a thorough assessment of the groundwater quality at the Landfill is warranted to determine whether the Landfill has caused pollution or poses a threat to the groundwater at the site. As the owner and operator of the closed Landfill, CalMat is responsible for the investigation of the discharges of waste from the Landfill .
14. CWC section 13267(b)(1) states, in part: *In conducting an investigation. . . , the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region . . . shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.*
15. This Order requires the persons named herein to prepare and submit technical reports in order to evaluate the conditions at the Landfill and to determine if any discharges of waste has impacted, or threaten to impact, groundwater quality in the area. You are expected to submit a complete report as required by this Order, to the Regional Board. The Regional Board may reject the report if it is deemed incomplete under this Order.
16. The Regional Board needs this information in order to determine whether a discharge of waste to groundwater has occurred or is occurring from the Landfill.
17. The burdens, including costs, of the report bear a reasonable relationship to the need for the report and the benefits to be obtained from the report. The information is necessary to identify sources of discharges of waste and to protect groundwater quality, which may be impacted due to discharges of waste from the Landfill.
18. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to

section 15321(a)(2), chapter 3, title 14 of the California Code of Regulations (CCR). This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plans are not yet known. It is unlikely that implementation of the work plans associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.

19. Any person aggrieved by this action of the Regional Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with CWC section 13320 and CCR, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that CalMat, pursuant to section 13267(b) of the California Water Code, is required to submit a technical report to the Regional Board, by April 30, 2014, that includes the following:

1. A description of historical and current activities at the Landfill, including site conditions prior to landfill operations, waste disposal practices during the active life of Landfill, the types and volume of wastes received during its operation, how the final cover was constructed, all land uses after final closure, post closure maintenance activities, and any Best Management Practices (BMPs) that have been applied at the site to prevent the pollution of ground and surface water resources;
2. A description of any groundwater monitoring wells and lysimeters at the Landfill, including the locations, construction information (i.e. total depth, depth of perforations, well diameter, and boring logs), and the current conditions of such wells;
3. A summary of all groundwater monitoring activities conducted at the site, including any groundwater monitoring data collected after 2007 that has not been submitted to the Regional Board, and an evaluation of all existing groundwater monitoring data to determine whether the Landfill has discharge waste to groundwater and caused, or threatens to cause, pollution;
4. A description of the current landfill gas monitoring and controlling measures at the Landfill, including an evaluation of whether the groundwater quality has been impacted by landfill gas released from the Landfill; and
5. Propose a groundwater monitoring program, for the approval by the Executive Officer, to continue groundwater monitoring of the Landfill and include a schedule for implementation. The groundwater monitoring program shall include a description of local geology and hydrogeology conditions and a conceptual model that demonstrates the relations between the waste mass, the surrounding native geological materials, the underlain groundwater aquifer, and locations of groundwater monitoring wells. The

groundwater monitoring network shall be capable of determining groundwater quality upgradient and downgradient of deposited wastes. If necessary, new groundwater monitoring wells shall be proposed. The constituents of concerns (COCs) monitored in the program shall include all chemicals that may be, or have been, discharged from the Landfill and impact water quality.


Pursuant to 13268(a) of the CWC, any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to section 13268(b)(1) of the CWC, failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

The State Water Resources Control Board adopted regulations (CCR, title 23, division 3, chapter 30 and CCR, title 27, division 3) requiring the electronic submittal of information (ESI) for all site cleanup programs, starting January 1, 2005. Currently, all of the information on electronic submittals and GeoTracker contacts can be found at http://www.waterboards.ca.gov/ust/electronic_submittal. To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in Regional Board letters and orders issued to you or for the site. However, we may request that you submit hard copies of selected documents and data to the Regional Board in addition to electronic submittal of information to GeoTracker. For your convenience, the GeoTracker Global ID for this site is T10000004448.

The Regional Board, under the authority given by CWC section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by a senior authorized representative for CalMat (not by a consultant). The perjury statement shall be in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

SO ORDERED.


Samuel Unger, P.E.
Executive Officer

Shaffer, Caleb

From: Yang, Wen@Waterboards [Wen.Yang@waterboards.ca.gov]
Sent: Friday, November 22, 2013 10:05 AM
To: Watt, Jamey
Cc: Shaffer, Caleb; Massey, Michael; Hatlestad, Heather@Waterboards; Heath, Arthur@Waterboards; NClite@otie.com; John.Lindquist@CH2M.com; Cross, Douglas@Waterboards
Subject: RE: Hewitt Pit landfill - EPA letter to LARWQCB

Thank you, Jamey and Caleb, for issuing the letter. We will look into the matter and start the process of issuing a Water Code Section 13267 letter.

Wen Yang, Ph.D., C.E.G.
Chief, Land Disposal Unit
Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Phone: 213.620.2253
Facsimile: 213.576.5777
wyang@waterboards.ca.gov

From: Watt, Jamey [<mailto:Watt.Jamey@epa.gov>]
Sent: Thursday, November 21, 2013 1:51 PM
To: Yang, Wen@Waterboards
Cc: Shaffer, Caleb; Massey, Michael; Hatlestad, Heather@Waterboards; Heath, Arthur@Waterboards; NClite@otie.com; John.Lindquist@CH2M.com; Watt, Jamey
Subject: Hewitt Pit landfill - EPA letter to LARWQCB

Hello Dr. Yang.

Please find attached the requested letter from EPA to LARWQCB regarding the Hewitt Pit landfill.

If you have any questions, please feel free to contact me.

Sincerely,

Jamey Watt
Remedial Project Manager
415-972-3175

U.S. EPA, Region 9
Superfund Division, SFD-7-1
75 Hawthorne Street
San Francisco, CA 94105

Shaffer, Caleb

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Cc: Shaffer, Caleb; Massey, Michael; Hatlestad, Heather@Waterboards;
Arthur.Heath@waterboards.ca.gov; NClite@otie.com; John.Lindquist@CH2M.com; Watt,
Jamey
Subject: Hewitt Pit landfill - EPA letter to LARWQCB
Attachments: 2013-11-20 - EPA letter to LARWQCB concerning Hewitt Pit.pdf

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Sincerely,

Jamey Watt
Remedial Project Manager
415-972-3175

U.S. EPA, Region 9
Superfund Division, SFD-7-1
75 Hawthorne Street
San Francisco, CA 94105



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

November 20, 2013

Wen Yang, Ph.D., C.E.G.
Chief, Land Disposal Unit
Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Hewitt Pit Landfill
7245 - 7361 Laurel Canyon Rd., North Hollywood, CA 91605

Dear Dr. Yang:

Based on recent conversations with the Los Angeles Regional Water Quality Control Board ("RWQCB") and investigations conducted under the Superfund Program, the U.S. Environmental Protection Agency, Region 9 Office ("EPA Region 9") has concerns that the closed Hewitt Pitt Landfill may potentially be releasing pollutants that are contributing to groundwater contamination in the area. The Hewitt Pit Landfill is located at 7245-7361 Laurel Canyon Road in North Hollywood, California.

EPA Region 9 requests the assistance and cooperation of RWQCB staff in the investigation of potential contamination of groundwater related to the landfill site. EPA Region 9 understands that the Hewitt Pitt Landfill belongs to a RWQCB category of Closed, Abandoned, or Inactive (CAI) landfills that are normally not regulated under Waste Discharge Requirements, unless there are existing environmental issues related to the site. EPA Region 9 hopes that this letter can be used as justification for the Regional Board to issue a CWC Section 13267 order to require the landfill owner to collect groundwater monitoring data at the landfill and submit to the Regional Board.

If you have any questions or concerns, I can be reached at 415-972-3336 or shaffer.caleb@epa.gov. I look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Caleb Shaffer", is written over a horizontal line.

Caleb Shaffer
Section Chief, CA Site Cleanup Section I

Shaffer, Caleb

From: Watt, Jamey
Sent: Friday, November 01, 2013 3:27 PM
To: Shaffer, Caleb; Massey, Michael
Subject: FW: Hewitt Pit

Caleb and Mike.

Honeywell and LARWQCB are requesting a letter from EPA to LARWQCB asking LARWQCB to investigate the Hewitt Pit landfill. The Hewitt Pit landfill is west/northwest of the Honeywell facility. There is a possibility that gw contamination could be coming from this facility and that it could be a part of NHOU. Evidently, Kelly committed to writing such a letter to LARWQCB, but didn't get a chance to before leaving.

I'll work on this as soon as I can and forward a draft for your review before sending anything out.

See note below from LARWQCB requesting such assistance.

Thanks.

Jamey Watt
Remedial Project Manager
415-972-3175

U.S. EPA, Region 9
Superfund Division, SFD-7-1
75 Hawthorne Street
San Francisco, CA 94105

From: Hatlestad, Heather@Waterboards [<mailto:Heather.Hatlestad@waterboards.ca.gov>]
Sent: Friday, November 01, 2013 9:31 AM
To: Watt, Jamey
Subject: FW: Hewitt Pit

Hi Jamey,

I got some clarification from Wen Yang regarding the letter for Hewitt Pit, see below. I think it makes sense for you to work directly with him moving forward as this is his case, and he has more knowledge of what is needed. Let me know what you think.

Thanks,

Heather Hatlestad
Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit IV
320 W. 4th St., Suite 200
Los Angeles, CA 90013
(213) 576-6729

From: Yang, Wen@Waterboards
Sent: Friday, November 01, 2013 8:49 AM
To: Hatlestad, Heather@Waterboards
Cc: Cross, Douglas@Waterboards
Subject: RE: Hewitt Pit

Hi, Heather,

The letter that the EPA was expected to send to the Regional Board would say that, based on the investigations conducted under the Superfund Program, the US EPA believes, or has concerns, that the closed Hewitt Landfill has been releasing pollutants that coursed or contributed to the pollution of groundwater in the area. The letter should request the cooperation or assistance of Regional Board staff in the investigation and remediation of groundwater pollution related to the landfill site. The letter is needed because the Hewitt Landfill belongs to the category of Close, Abandoned, or Inactive (CAI) landfills that are normally not regulated under WDRs, unless there are existing environmental issues related to the site. The letter from EPA could be used as a justification for the Regional Board to issue a CWC Section 13267 order to require the landfill owner to collect groundwater monitoring data at the landfill and submit to the Regional Board. Additional regulatory/enforcement actions may be taken based on a review of the submitted data.

I do not have a sample of this type of letter because this is a unique case that we have not dealt with in the past. Please let Jamey know that he can contact me or Doug any time if he has questions. Thank you again for your help.

Wen Yang, Ph.D., C.E.G.

Chief, Land Disposal Unit
Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Phone: 213.620.2253
Facsimile: 213.576.5777
wyang@waterboards.ca.gov

Shaffer, Caleb

From: Watt, Jamey
Sent: Tuesday, October 29, 2013 12:55 PM
To: Massey, Michael; Muratore, Kim; Nova Clite; John.Lindquist@CH2M.com
Cc: Shaffer, Caleb; Hatlestad, Heather@Waterboards
Subject: FW: Status of Water Board NHOU PRP Search Efforts and the Hewitt Pit

Mike, Kim, Nova and John.

Can you please help me with the information below regarding a proposed letter from USEPA to LARWQCB regarding Hewitt Pit investigation activities?

I am unaware of any letter that EPA needs to write and I don't think Kelly left me with any information on this matter.

Thanks for your help.

Thank you.

Jamey Watt
Remedial Project Manager
415-972-3175

U.S. EPA, Region 9
Superfund Division, SFD-7-1
75 Hawthorne Street
San Francisco, CA 94105

From: Donald Walsh [<mailto:Donald.A.Walsh@mwhglobal.com>]
Sent: Monday, September 30, 2013 12:47 PM
To: Watt, Jamey
Cc: Dehghi, Benny; Nova Clite PG (NClite@otie.com)
Subject: FW: Status of Water Board NHOU PRP Search Efforts and the Hewitt Pit

Jamey,

After receiving the email below, I talked to Heather Hatlestad regarding whether any action had been taking with regards to Hewitt Pit. She reiterated again that the site would remain in the Landfill Units hands unless the Water Board got the letter from USEPA. She mentioned that Water Board staff met with you last week and that she specifically brought up the need for the letter.

Heather also suggested that I call the Landfill Unit for a status update. I called Wen Yang, the Water Board Lead for the Hewitt Pit in the Landfill Unit (213-620-2253). Wen Yang was aware of the situation, but also stated that the Landfill Unit was waiting on a letter from the USEPA.

I recognize that you have a lot going on as you digest this complex site, but I wanted to just let you know the status of the situation. Recall that Kelly Manheimer had committed to issuing a letter to Water Board notifying them of the 4909F well replacement, stating that EPA was disappointed that Vulcan only replaced the well and did not install a shallow/deep nest. Also, the letter will state that EPA believes a full investigation of the landfill is needed (as stated in the FFS). With this letter, Water Board staff indicated they would issue an order for investigation of the landfill.

The need for this letter is heightened by the recent AMEC results showing TCE at 65-110 ug/L around the former Hewitt Pit, and the detection of 120 ug/L of 1,4-dioxane immediately downgradient of the pit. These data were transmitted to EPA in a 9/16/13 email from AMEC (Michael Taraszki) titled, "NHOU analytical data summary - second sampling event".

Thanks,

MWH Americas, Inc.
Donald A. Walsh
Vice President/Hydrogeologist

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From: Hatlestad, Heather@Waterboards [<mailto:Heather.Hatlestad@waterboards.ca.gov>]
Sent: Monday, September 30, 2013 12:14 PM
To: Donald Walsh; Dehghi, Benny
Cc: Lee, Kwang@Waterboards; Heath, Arthur@Waterboards
Subject: RE: Status of Water Board NHOU PRP Search Efforts

Hi all,

We will have to cancel our biweekly meeting for tomorrow as I will be out of the office in training, and Dr. Lee will be out of the office until next week. We can reschedule for next week if there is something pressing, otherwise we will proceed the week after as normal.

Thanks,

Heather Hatlestad
Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit IV
320 W. 4th St., Suite 200
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(213) 576-6729

-----Original Appointment-----

From: Donald Walsh [<mailto:Donald.A.Walsh@us.mwhglobal.com>]
Sent: Friday, March 29, 2013 9:14 AM
To: Donald Walsh; Lee, Kwangil@Waterboards; Hu, Jeffrey@Waterboards; Heath, Arthur@Waterboards; Moore, Lawrence@Waterboards; Dehghi, Benny
Subject: Status of Water Board NHOU PRP Search Efforts
When: Occurs every 2 weeks on Tuesday effective 4/16/2013 until 12/27/2013 from 4:00 PM to 5:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: 1-866-394-4146, 743 207 217

As agreed with Dr. Lee, we would like to re-institute our bi-weekly check-in on the status of the PRP Search Efforts in the NHOU. Looking forward to the collaboration.

MWH Americas, Inc.
Donald A. Walsh
Vice President/Hydrogeologist

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